

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

_____	)	
CONTENTGUARD HOLDINGS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
AMAZON.COM, INC.; APPLE INC.;	)	
BLACKBERRY LIMITED (FKA RESEARCH	)	
IN MOTION LIMITED) AND BLACKBERRY	)	
CORPORATION (FKA RESEARCH IN	)	
MOTION CORPORATION); HTC	)	
CORPORATION AND HTC AMERICA, INC.;	)	No. 2:13-cv-01112 (JRG)
HUAWEI TECHNOLOGIES CO., LTD. AND	)	
HUAWEI DEVICE USA, INC.; MOTOROLA	)	JURY TRIAL DEMANDED
MOBILITY LLC; SAMSUNG ELECTRONICS	)	
CO., LTD., SAMSUNG ELECTRONICS	)	
AMERICA, INC., and SAMSUNG	)	
TELECOMMUNICATIONS AMERICA, LLC,	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
DIRECTV, LLC	)	
	)	
Intervener.	)	
_____	)	

**SECOND NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF  
AMAZON.COM'S MOTION TO DISMISS SECOND AMENDED COMPLAINT**

Defendant Amazon.com, Inc. ("Amazon") files this notice to inform the Court of two more recent decisions supporting Amazon's Motion to Dismiss Second Amended Complaint (Dkt. No. 298): *Vehicle Intelligence and Safety LLC v. Mercedes-Benz USA, LLC*, No. 13 C 4417 (N.D. Ill. Jan. 29, 2015) (attached as exhibit A), and *The Money Suite Co. v. 21st Century Insurance and Financial Services, Inc.*, C.A. No. 13-984-GMS (D. Del. Jan. 27, 2015) (attached

as exhibit B). These decisions invalidate patents analogous to the patents-in-suit as drawn to unpatentable subject matter under 35 U.S.C. § 101.

January 30, 2015

Respectfully submitted,

/s/ Jennifer Haltom Doan

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Counsel for Defendant AMAZON.COM, INC.

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on January 30, 2015. *See* Local Rule CV-5(a)(3)(A).

/s/Jennifer H. Doan

Jennifer H. Doan